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June 8, 2009

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RECEIVED

JUN 19 2009

AT 8:30 M
WILLIAM T. WALSH, CLERK

VIA E-FILING and MAIL

Michael A. Shipp, U.S.M.J.
United States District Court
Martin Luther King Jr.
Federal Building and Courthouse
50 Walnut Street
Newark, NJ 07102

Re: Kristy Bodle v. ImageCare Centers
Civil Action No. 08-5502 (SRC)

Dear Judge Shipp:

We represent Defendant in the above matter. We are writing to request an extension to the fact discovery and deposition deadline in the Order dated February 20, 2009. Plaintiff's counsel has consented to the extension. The current deadline is July 15, 2009 and we request a one month extension to August 17, 2009.

Currently, there is a Motion to Compel pending in the Court that is returnable on June 15, 2009. Defendant will need discovery obtained from the Motion in order to proceed with depositions. Furthermore, I will be out of the office for my wedding and honeymoon from the end of June until mid-July.

Thank you for your kind consideration.

Respectfully,

JACOBS ROSENBERG, LLC

By: /s/Neha Dalal (ND7946)
Neha Dalal, Esq.

cc: Ellen Smith, Esq.
Doreen Giambrone

So Ordered this 19th day
of June, 2009
MA Shipp